UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

DOCKETED
DEC 2 1 2000

In the Matter of

U.S. Cellular Corporation
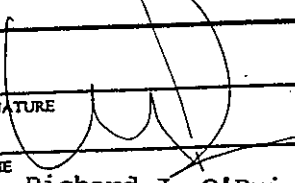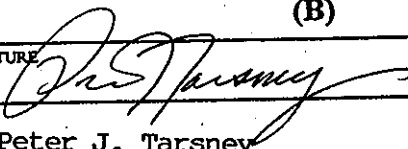   v.
John Doe, an individual, and Does 1-3

JUDGE MORAN
MAGISTRATE JUDGE DENLOW

Case Number: 00C 7988

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

U.S. Cellular Corporation

(A)				
SIGNATURE				
NAME Richard J. O'Brien				
FIRM Sidley & Austin				
STREET ADDRESS 10 South Dearborn, Bank One Plaza				
CITY/STATE/ZIP Chicago, IL 60603				
TELEPHONE NUMBER (312) 853-7283				
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 03125248				
MEMBER OF TRIAL BAR?	YES ☒	NO ☐		
TRIAL ATTORNEY?	YES ☒	NO ☐		

(B)				
SIGNATURE				
NAME Peter J. Tarsney				
FIRM Sidley & Austin				
STREET ADDRESS 10 South Dearborn, Bank One Plaza				
CITY/STATE/ZIP Chicago, IL 60603				
TELEPHONE NUMBER (312) 853-7169				
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6230388				
MEMBER OF TRIAL BAR?	YES ☐	NO ☒		
TRIAL ATTORNEY?	YES ☐	NO ☒		
DESIGNATED AS LOCAL COUNSEL?	YES ☐	NO ☐		

(C)				
SIGNATURE				
NAME				
FIRM				
STREET ADDRESS				
CITY/STATE/ZIP				
TELEPHONE NUMBER				
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)				
MEMBER OF TRIAL BAR?	YES ☐	NO ☐		
TRIAL ATTORNEY?	YES ☐	NO ☐		
DESIGNATED AS LOCAL COUNSEL?	YES ☐	NO ☐		

(D)				
SIGNATURE				
NAME				
FIRM				
STREET ADDRESS				
CITY/STATE/ZIP				
TELEPHONE NUMBER				
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)				
MEMBER OF TRIAL BAR?	YES ☐	NO ☐		
TRIAL ATTORNEY?	YES ☐	NO ☐		
DESIGNATED AS LOCAL COUNSEL?	YES ☐	NO ☐		

JS 44
(Rev. 12/96)

CIVIL COVER SHEET

DOCKETED
DEC 2 1 2000

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

U.S. Cellular Corporation

DEFENDANTS

John Doe, John Doe 1, JUDGE MORAN
Does 1-3
MAGISTRATE JUDGE DENLOW

00C 7988

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF   Cook
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE
TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)
Sidley & Austin
10 South Dearborn
Bank One Plaza
Chicago, IL 60603
(312) 853-7000

ATTORNEYS (IF KNOWN)

II. BASIS OF JURISDICTION   (PLACE AN "X" IN ONE BOX ONLY)

☐ 1 U.S. Government Plaintiff

☒ 3 Federal Question
(U.S. Government Not a Party)

☐ 2 U.S. Government Defendant

☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)
(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated or Principal Place of Business in This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated and Principal Place of Business in Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. ORIGIN   (PLACE AN "X" IN ONE BOX ONLY)

☒ 1 Original Proceeding

☐ 2 Removed from State Court

☐ 3 Remanded from Appellate Court

☐ 4 Reinstated or Reopened

☐ 5 Transferred from another district (specify)

☐ 6 Multidistrict Litigation

☐ 7 Appeal to District Judge from Magistrate Judgment

V. NATURE OF SUIT   (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance	**PERSONAL INJURY**	**PERSONAL INJURY**	☐ 610 Agriculture	☐ 422 Appeal 28 USC 158	☐ 400 State Reapportionment
☐ 120 Marine	☐ 310 Airplane	☐ 362 Personal Injury — Med. Malpractice	☐ 620 Other Food & Drug		☐ 410 Antitrust
☐ 130 Miller Act	☐ 315 Airplane Product Liability	☐ 365 Personal Injury — Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881	☐ 423 Withdrawal 28 USC 157	☐ 430 Banks and Banking
☐ 140 Negotiable Instrument	☐ 320 Assault, Libel & Slander	☐ 368 Asbestos Personal Injury Product Liability	☐ 630 Liquor Laws		☐ 450 Commerce/ICC Rates/etc.
☐ 150 Recovery of Overpayment & Enforcement of Judgment	☐ 330 Federal Employers' Liability		☐ 640 R.R. & Truck	**PROPERTY RIGHTS**	☐ 460 Deportation
☐ 151 Medicare Act	☐ 340 Marine	**PERSONAL PROPERTY**	☐ 650 Airline Regs.	☐ 820 Copyrights	☐ 470 Racketeer Influenced and Corrupt Organizations
☐ 152 Recovery of Defaulted Student Loans (Excl. Veterans)	☐ 345 Marine Product Liability	☐ 370 Other Fraud	☐ 660 Occupational Safety/Health	☐ 830 Patent	☐ 810 Selective Service
☐ 153 Recovery of Overpayment of Veteran's Benefits	☐ 350 Motor Vehicle	☐ 371 Truth in Lending	☐ 690 Other	☐ 840 Trademark	☐ 850 Securities/Commodities/ Exchange
☐ 160 Stockholders' Suits	☐ 355 Motor Vehicle Product Liability	☒ 380 Other Personal Property Damage	**LABOR**	**SOCIAL SECURITY**	☐ 875 Customer Challenge 12 USC 3410
☐ 190 Other Contract	☐ 360 Other Personal Injury	☐ 385 Property Damage Product Liability	☐ 710 Fair Labor Standards Act	☐ 861 HIA (1395ff)	☐ 891 Agricultural Acts
☐ 195 Contract Product Liability				☐ 862 Black Lung (923)	☐ 892 Economic Stabilization Act
			☐ 720 Labor/Mgmt. Relations	☐ 863 DIWC/DIWW (405(g))	☐ 893 Environmental Matters
REAL PROPERTY	**CIVIL RIGHTS**	**PRISONER PETITIONS**		☐ 864 SSID Title XVI	☐ 894 Energy Allocation Act
☐ 210 Land Condemnation	☐ 441 Voting	☐ 510 Motion to Vacate Sentence	☐ 730 Labor/Mgmt. Reporting & Disclosure Act	☐ 865 RSI (405(g))	☐ 895 Freedom of Information Act
☐ 220 Foreclosure	☐ 442 Employment	**Habeas Corpus:**	☐ 740 Railway Labor Act	**FEDERAL TAX SUITS**	☐ 900 Appeal of Fee Determination Under Equal Access to Justice
☐ 230 Rent Lease & Ejectment	☐ 443 Housing/ Accommodations	☐ 530 General			
☐ 240 Torts to Land	☐ 444 Welfare	☐ 535 Death Penalty	☐ 790 Other Labor Litigation	☐ 870 Taxes (U.S. Plaintiff or Defendant)	☐ 950 Constitutionality of State Statutes
☐ 245 Tort Product Liability	☐ 440 Other Civil Rights	☐ 540 Mandamus & Other			☒ 890 Other Statutory Actions
☐ 290 All Other Real Property		☐ 550 Civil Rights	☐ 791 Empl. Ret. Inc. Security Act	☐ 871 IRS — Third Party 26 USC 7609	
		☐ 555 Prison Condition			

VI. CAUSE OF ACTION   (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

Impairing Computer Facilities in violation of 18 U.S.C. § 1030 (a)(5)(B),(c);
Unlawful Access to Stored Communications, 18 U.S.C.§ 2701, et. seq.;
Computer tampering 720 ILCS 5/16 D-1, et seq.

VII. REQUESTED IN COMPLAINT

CHECK IF THIS IS A **CLASS ACTION**
☐ UNDER F.R.C.P. 23

DEMAND $

CHECK YES only if demanded in complaint
JURY DEMAND: ☐ YES   ☒ NO
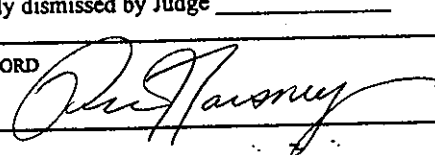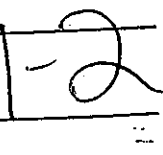
VIII.   This case   ☒ is not a refiling of a previously dismissed action.
☐ is a refiling of case number_____, previously dismissed by Judge _____

DATE   12/20/00

SIGNATURE OF ATTORNEY OF RECORD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOCKETED

DEC 2 1 2000

U.S. CELLULAR CORPORATION	) JUDGE MORAN
	)
Plaintiff,	) Case No.
	) 00C 7988
v.	)
	)
JOHN DOE, an individual, and DOES 1-3	) MAGISTRATE JUDGE DENLOW
	)
Defendants.	)

COMPLAINT

Plaintiff U.S. Cellular Corporation ("USCC") alleges as follows:

NATURE OF USCC'S CLAIMS

1.   This is an action for violations of the Computer Fraud and Abuse Act of

1996 (18 U.S.C. § 1030), the Electronic Communications Privacy Act (18 U.S.C. § 2701, et

seq.), the Illinois Computer Crime Prevention Law (720 ILCS 5/16D-1, et seq.), and trespass to

chattels. USCC is in the business of providing wireless telephone services to over 3.0 million

customers around the world. This action arises from Defendant(s) malicious, unauthorized and

intentional placement of obscene and pornographic images on USCC's web site. This unlawful

conduct by Defendant(s) has caused USCC to suffer harm. Moreover, Defendant(s)' conduct is

so egregious that it justifies an award of punitive damages in favor of USCC.

JURISDICTION

2.   This Court has jurisdiction over the subject matter pursuant to 28 U.S.C. §

1331, and supplemental jurisdiction over USCC's state and common law claims pursuant to 28

U.S.C. § 1367.

THE PARTIES

3.   Plaintiff USCC is a corporation organized and existing under the laws of the State of Delaware with its principal place of business in 8410 West Bryn Mawr, Chicago, IL 60631-3486. USCC provides wireless telephone service to more than 3.0 million customer in 44 markets and 25 states. USCC also maintains a web site on the Internet, www.uscc.com, that enables its customers and prospective customers to obtain information about its wireless services. This web site is operated and maintained on computer server equipment owned by USCC and located in Chicago, Illinois.

4.   The true name and capacity of defendant John Doe is unknown to USCC, and USCC will seek leave of court to amend this complaint to allege such name and capacity as soon as it is ascertained.

5.   The true names and capacities of defendant Does 1-3 are unknown to USCC, and USCC will seek leave of court to amend this complaint to allege such name and capacity as soon as it is ascertained.

BACKGROUND ALLEGATIONS

The Internet

6.   Defendant(s) committed the acts complained of through the use of the Internet. The Internet is a complex "network of networks" that interconnects innumerable smaller groups of linked computers. All of the networks comprising the Internet are connected in a manner that permits any computer on the Internet to communicate with any other computer

-2-

on the Internet. Each of these networked computers is assigned a numeric address akin to an area code and telephone number and referred to as an Internet Protocol ("IP") address that other computers on the Internet use to route messages and data to that computer. Each IP address is in the form of a sequence of numbers: e.g., 123.112.101.1.

7.   Because the long sequence of numbers of an IP address is difficult for people to remember, most IP addresses are assigned corresponding alphanumeric addresses, also known as "fully-qualified domain names," such as "www.uscc.com." Each unique fully-qualified domain name must refer to a single IP address, so that communications are routed correctly. Businesses are typically assigned domain names with the ".com" or ".net" designation (e.g., "uscc.com"), while educational and governmental organizations usually are assigned ".edu" and ".gov" domain names (e.g., "university.edu" and "federalagency.gov"). These alphanumeric addresses are commonly referred to as "domain names." Internet users generally send and receive communications by the use of fully-qualified domain names, rather than numeric IP addresses, since they are easier to type and remember.

8.   A domain name can be used to communicate with a remote computer (called a "host") that stores a web site and is coupled to the Internet. A web site is a collection of computer files (called "pages"), usually related by a common theme (e.g., information about a single company). A web page typically includes a collection of text and graphics organized for electronic publication. Each web page is located by a unique address called a Uniform Resource Locator ("URL"), which includes a fully-qualified domain name. An example of a URL is "http://www.uscc.com/uscc_com/SilverStream/index.html," which contains the fully-qualified domain name "www.uscc.com." A user requests a web page by entering its URL into software called a browser that is installed on the user's computer. Information published at a web site is

generally available to any user with a browser who is connected to the Internet, regardless of the user's geographical location. Thus, a web site hosted by a computer in California is as readily available to Internet users in New York as it is to users in California.

The USCC Host Computer, Web Server Software & Web Site

9.   USCC maintains its web site on a host computer owned and operated by USCC. The host computer runs web server software which produces the actual contents or pages of USCC's web site. When USCC wants to change the contents of its web site (e.g., change the photographs of people on the main page of the web site), it does so using software on a separate computer that sends commands to the web server software on the host computer. The computer code, or "language," that commands the web server software to perform specific tasks is called hypertext transfer protocol ("HTTP"). Thus, for example, USCC could sent a "put" command to its web server software, which would instruct the web server software to "put" a particular object or image on the home page.

10.   USCC secures the information on its host computer equipment, its web server software and its web page in a number of ways. USCC's host computer is maintained on a protected network, which is referred to as a DMZ network. A DMZ network (or demilitarized zone network) is a computer host or small network inserted as a "neutral zone" between a company's private network and the outside public network. USCC's employees working from USCC's private computer network are able to access the public network through the DMZ network, but public users cannot access USCC's private business computers on its private computer network. Public users can, however, view information stored on the DMZ network, such as the company's web page, www.uscc.com. USCC also has incorporated security measures into its web page and host server to prevent viewers from changing certain information

-4-

on the web page, unless they possess specific authorization to do so.

11.   On Wednesday, September 20, 2000, USCC's customer service department reported receiving phone calls stating that its web site was defaced. The defacement was comprised of sexually explicit graphics being presented on the web site's home page. USCC immediately began an investigation into this intrusion upon its web page and host computer. That investigation determined that the modifications were made on September 19 and 20 from the Internet by persons unrelated to the web site and the host computer server.

<p align="center">The September 19, 2000 Hacking</p>

12.   USCC's web server software access logs, which catalog all HTTP requests made to its host computer, demonstrate that Defendant(s) sent unauthorized HTTP requests to the web server software on or about 7:16 p.m., CST, on September 19, 2000. These HTTP commands instructed USCC's web server software to delete, create and modify existing files or objects being stored on the host computer and web site. The IP address of the Defendant(s) that changed the web server software was 63.255.158.84. The first access time was 7:16:23 p.m. CST, and the last access time was 8:36:10 p.m. CST. USCC has learned from the American Registry of Internet Numbers (ARIN) that this address is assigned to ISP provider Splitrock Services, Inc., which is located at 9012 New Trails Drive, The Woodlands, Texas 77381.

13.   During this unauthorized invasion of USCC's host computer, web server software and web site, Defendant(s) successfully created and/or modified five (5) files, and were able to incorporate the image designated as 3.jpg (see Exhibit A) on an internal page of the web site. Defendant(s) successfully deleted fifty-five (55) files (see Exhibit B for list of files). As a consequence of Defendant(s) conduct, the host computer could not serve USCC's main web site.

<p align="center">-5-</p>

This prevented USCC employees, customers and the general public from being able to gain access to the web site. The web site remained inaccessible for over eleven hours. By the early morning of September 20, 2000, USCC had fixed the damage caused by Defendants.

The September 20, 2000 Hacking

14. USCC's web server software access logs, which catalog all HTTP requests made to its host computer, demonstrate that Defendant(s) sent unauthorized HTTP requests to the web server software on or about 7:37 p.m., CST, on September 20, 2000. Once again, Defendant(s) successfully created four (4) files, including the pornographic and obscene image designated as the file h-USCstaticpics_r2_cl.jpg, and deleted three files (see Exhibit C for list of files) by sending HTTP commands to USCC's web server software without authorization. These modifications caused an offensive image to be displayed on the home page. (See Exhibit D). The IP address of the Defendant(s) that made these modifications was 63.255.158.62. The first access time was 7:37:33 p.m. CST, and the last access time was 8:33:25 p.m. CST. USCC has learned from the American Registry of Internet Numbers (ARIN) that this address is assigned to ISP provider Splitrock Services, Inc., which is located at 9012 New Trails Drive, The Woodlands, Texas 77381.

15. At or about 9:00 p.m. CST on September 20, 2000, USCC took its web site off-line to correct the problems created by Defendant(s). Thus, USCC's employees, customers and the general public could not gain access to the web site until the problem was corrected at or about 3:15 a.m. CST on September 21, 2000.

COUNT I
(Impairing Computer Facilities in Violation of the
Computer Fraud and Abuse Act, 18 U.S.C. § 1030(a)(5)(C))

16.   USCC repeats and realleges paragraphs 1 through 15 of the Complaint as if fully set forth herein.

17.   In connection with its provision of online and Internet computer services to its customers, who are citizens of Illinois and other states, USCC maintains computers and a computer system that are "protected computers" as the term is defined in 18 U.S.C. § 1030(e)(2)(B) because they are used in interstate commerce and communication ("USCC's protected computer facilities").

18.   Defendants have intentionally transmitted or caused to be transmitted over USCC's protected computer facilities computer files, objects and/or images containing pornographic and obscene images.

19.   Defendants have intentionally manipulated and deleted the computer files, objects and/or images on USCC's protected computer facilities in order to place pornographic and obscene images on USCC's web site.

20.   Defendant(s)' transmission of computer files, objects and/or images was not authorized.

21.   As a result of Defendants' conduct, USCC has suffered damages, including impairment of the integrity and/or availability of data, programs, systems, and/or information in USCC's protected computer facilities, in an amount to be determined at trial. USCC's damages are, in the aggregate, at least $5,000 in value in the year preceding the date of

the filing of this complaint.

COUNT II
(Impairing Computer Facilities in Violation of the Computer Fraud and Abuse Act, 18 U.S.C. § 1030(a)(5)(B))

22.   USCC repeats and realleges paragraphs 1 through 15 of the Complaint as if fully set forth herein.

23.   In connection with its provision of online and Internet computer services to its customers, who are citizens of Illinois and other states, USCC maintains computers and a computer system that are "protected computers" as the term is defined in 18 U.S.C. § 1030(e)(2)(B) because they are used in interstate commerce and communication ("USCC's protected computer facilities").

24.   Defendants have intentionally and recklessly transmitted or caused to be transmitted over USCC's protected computer facilities computer files, objects and/or images containing pornographic and obscene images.

25.   Defendants have intentionally and recklessly manipulated and deleted the computer files, objects and/or images on USCC's protected computer facilities in order to place pornographic and obscene images on USCC's web site.

26.   Defendant(s)' transmission of computer files, objects and/or images was not authorized.

27.   As a result of Defendants' reckless conduct, USCC has suffered damages, including impairment of the integrity and/or availability of data, programs, systems, and/or information in USCC's protected computer facilities, in an amount to be determined at trial.

USCC's damages are, in the aggregate, at least $5,000 in value in the year preceding the date of the filing of this complaint.

COUNT III
(Unlawful Access to Stored Communications, 18 U.S.C. § 2701, et seq.)

28.　USCC hereby incorporates paragraphs 1 through 15 as though expressly stated herein.

29.　USCC stores information concerning its business services on its host computer and web site so that its employees, customers and potential customers may access this information over the Internet. Because these electronic communications are stored on USCC's host computer, USCC's host computer is a facility through which electronic communication service is provided.

30.　Defendant(s) intentionally accessed USCC's host computer and web server software and altered, deleted and modified its computer files, objects and/or images without authorization.

31.　As a consequence of Defendant(s)' intentional and unauthorized access, Defendant(s) obtained access to electronic communications in electronic storage in violation of 18 U.S.C. § 2701(a), deleted and/or altered such communications, and thereby prevented its employees, customers and potential customers from gaining access to USCC's electronic communications.

32.　USCC has been damaged by Defendant(s)' illegal acts.

33.　Because Defendant(s)' conduct was willful and intentional, USCC is

entitled to punitive damages.

COUNT IV
(Trespass To Chattels)

34. USCC repeats and realleges paragraphs 1 through 15 of the Complaint.

35. The computers, computer networks, and computer services that comprise USCC's web site are the personal property of USCC.

36. Without valid authorization, Defendants have intentionally and repeatedly obtained access to, and made use of, USCC's proprietary computer equipment to facilitate Defendant(s)' dissemination of obscene and pornographic images.

37. Through Defendant(s)' practice of transmitting obscene and pornographic images onto USCC's web site, Defendants have wrongfully exercised dominion over USCC's computers and web server software in denial of USCC's own rights to that property, and has thereby deprived USCC of legitimate use of this commercially valuable system.

38. Defendant(s)' conduct constitutes trespass to USCC's chattels.

39. As a result of Defendant(s)' trespass, USCC has been damaged in the loss of goodwill and customers and damage to business reputation, among other damages, in an amount to be determined at trial.

40. The conduct of Defendants alleged above was intentional, wanton, willful, oppressive and in conscious disregard of the rights of USCC. Accordingly, USCC is entitled to exemplary and/or punitive damages in an amount sufficient to punish defendant and deter Defendants and others from engaging in similar conduct.

COUNT V
(Computer Tampering, 720 ILCS 5/16D-1, et seq.)

41.   USCC hereby incorporates paragraphs 1 through 15 as though expressly stated herein.

42.   USCC's host computer equipment constitutes a "computer" within the meaning of 720 ILCS 5/16D-2(a).

43.   USCC's web server software constitutes a "computer program" within the meaning of 720 ILCS 5/16D-2(b).

44.   The HTTP commands sent by Defendant(s) to USCC's web server software and host computer constitute a "program" within the meaning of 720 ILCS 5/16D-2(b).

45.   Defendant(s) knowingly and without authorization inserted programs into USCC's web server software to (1) damage or destroy USCC's host computer, (2) alter, delete or remove a computer program or data from the host computer, web server software and/or the web site, and/or (3) cause loss to the users of USCC's host computer, web server software and web site.

46.   As a result of Defendant(s)' conduct, USCC has been damaged in an amount to be determined at trial, and demands reimbursement for reasonable attorney's fees and other litigation expenses pursuant to 720 ILCS 5/16D-3(c).

WHEREFORE, USCC prays:

1) That USCC be awarded actual or compensatory damages in an amount to be proven at trial;

2) That USCC be awarded any and all damages allowed by statute;

3) That USCC be awarded punitive damages;

4) That USCC be awarded its costs and attorneys' fees; and

5) That USCC be awarded such other and further relief as this Court deems appropriate.

U.S. CELLULAR CORPORATION

By: _____
      One of Its Attorneys

Dated: December 20, 2000

Richard J. O'Brien
Peter J. Tarsney
SIDLEY & AUSTIN
Bank One Plaza
10 S. Dearborn Street
Chicago, Illinois 60603
(312) 853-7000

EXHIBIT B

Files Modified/Deleted/Installed on September 19, 2000 by IP Address 63.255.158.84:

Path	File/Object	Action	Status from Server	Time	Date
AuthAgent/SilverStream/Objectstore/Images	3.jpg	PUT	201 Created	20:01:38	September 19, 2000
AuthAgent/SilverStream/Pages	mapshow.html	PUT	201 Created	20:03:05	September 19, 2000
AuthAgent/SilverStream/Classes/com/sssw/gen/pages	mapshow.html	PUT	201 Created	20:03:08	September 19, 2000
AuthAgent/SilverStream/Classes/com/sssw/gen/pages	mapshow.beans	PUT	201 Created	20:03:11	September 19, 2000
AuthAgent/SilverStream/Classes/com/sssw/gen/pages	mapshow.class	DELETE	200 OK	20:03:26	September 19, 2000
AuthAgent/SilverStream/Pages	mapshow.html	PUT	403 Forbidden	20:04:23	September 19, 2000
AuthAgent/SilverStream/Classes/com/sssw/gen/pages	mapshow.html	PUT	403 Forbidden	20:04:32	September 19, 2000
AuthAgent/SilverStream/Meta/Agents/Types/security	srvSecurityLogin	DELETE	200 OK	20:08:31	September 19, 2000
AuthAgent/SilverStream/Classes/security	srvSecurityLogin.class	DELETE	200 OK	20:08:32	September 19, 2000
AuthAgent/SilverStream/Meta/Agents/Types	dsoDeleteCategory	DELETE	200 OK	20:09:01	September 19, 2000
AuthAgent/SilverStream/Classes	dsoDeleteCategory.class	DELETE	200 OK	20:09:06	September 19, 2000
AuthAgent/SilverStream/Meta/Agents/Types/MailObjects	SendMail	DELETE	200 OK	20:10:44	September 19, 2000
AuthAgent/SilverStream/Classes/MailObjects	SendMail.class	DELETE	200 OK	20:10:45	September 19, 2000
AuthAgent/SilverStream/Meta/Agents/Types/MailObjects	SendMailI	DELETE	200 OK	20:11:01	September 19, 2000
AuthAgent/SilverStream/Classes/MailObjects	SendMailI.class	DELETE	200 OK	20:11:07	September 19, 2000
AuthAgent/SilverStream/Pages	pg_aa_index.html	DELETE	200 OK	20:14:01	September 19, 2000
AuthAgent/SilverStream/Classes/com/sssw/gen/pages	pg_aa_index.html	DELETE	200 OK	20:14:01	September 19, 2000
AuthAgent/SilverStream/Classes/com/sssw/gen/pages	pg_aa_index.class	DELETE	200 OK	20:14:02	September 19, 2000
AuthAgent/SilverStream/Classes/com/sssw/gen/pages	pg_aa_index.beans	DELETE	200 OK	20:14:02	September 19, 2000
PRCouncil/SilverStream/Pages	e_navbottom.html	PUT	201 Created	20:16:02	September 19, 2000
PRCouncil/SilverStream/Classes/com/sssw/gen/pages	e_navbottom.html	PUT	403 Forbidden	20:16:03	September 19, 2000
PRCouncil/SilverStream/Pages	e_navbottom.html	PUT	412 Precondition Failed	20:16:41	September 19, 2000
PRCouncil/SilverStream/Pages	e_navbottom.html	PUT	403 Forbidden	20:16:45	September 19, 2000
PRCouncil/SilverStream/Classes/com/sssw/gen/pages	e_navbottom.html	PUT	403 Forbidden	20:16:46	September 19, 2000
SilverStream/	Permissions	POST	403 Forbidden	20:17:08	September 19, 2000
PRCouncil/SilverStream/Meta/Agents/Types	invServer	DELETE	200 OK	20:30:49	September 19, 2000
PRCouncil/SilverStream/Classes	invServer.class	DELETE	404 Not Found	20:30:50	September 19, 2000
PRCouncil/SilverStream/Meta/Agents/Types	invBuildDataQuery	DELETE	200 OK	20:30:54	September 19, 2000
PRCouncil/SilverStream/Classes	invBuildDataQuery.class	DELETE	403 Forbidden	20:30:55	September 19, 2000
security/SilverStream/Pages	pgSecurityLogin.html	DELETE	200 OK	20:31:22	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pgSecurityLogin.html	DELETE	200 OK	20:31:23	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pgSecurityLogin.class	DELETE	200 OK	20:31:24	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pgSecurityLogin.beans	DELETE	200 OK	20:31:25	September 19, 2000
security/SilverStream/Pages	pg_aa_supportindex.html	DELETE	200 OK	20:31:28	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pg_aa_supportindex.html	DELETE	200 OK	20:31:29	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pg_aa_supportindex.class	DELETE	200 OK	20:31:30	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pg_aa_supportindex.beans	DELETE	200 OK	20:31:30	September 19, 2000
security/SilverStream/Pages	pg_aa_supportCreateAA.html	DELETE	200 OK	20:31:33	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pg_aa_supportCreateAA.html	DELETE	200 OK	20:31:33	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pg_aa_supportCreateAA.class	DELETE	200 OK	20:31:34	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pg_aa_supportCreateAA.beans	DELETE	200 OK	20:31:34	September 19, 2000
security/SilverStream/Pages	pg_aa_supportAdded.html	DELETE	200 OK	20:31:36	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pg_aa_supportAdded.html	DELETE	200 OK	20:31:37	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pg_aa_supportAdded.class	DELETE	200 OK	20:31:38	September 19, 2000
security/SilverStream/Classes/com/sssw/gen/pages	pg_aa_supportAdded.beans	DELETE	200 OK	20:31:38	September 19, 2000

silver2/SilverStream/Pages	paperEdit.html	DELETE	501 Not Implemented	20:31:52	September 19, 2000
uscc_com/SilverStream/Pages	a_cpr012799.html	DELETE	200 OK	20:32:10	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_cpr012799.html	DELETE	200 OK	20:32:11	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_cpr012799.class	DELETE	200 OK	20:32:11	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_cpr012799.beans	DELETE	200 OK	20:32:12	September 19, 2000
uscc_com/SilverStream/Pages	a_commsafe.html	DELETE	200 OK	20:32:15	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_commsafe.html	DELETE	200 OK	20:32:15	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_commsafe.class	DELETE	200 OK	20:32:16	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_commsafe.beans	DELETE	200 OK	20:32:17	September 19, 2000
uscc_com/SilverStream/Pages	agm_setChooseIndex.html	DELETE	200 OK	20:32:46	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	agm_setChooseIndex.html	DELETE	200 OK	20:32:46	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	agm_setChooseIndex.class	DELETE	200 OK	20:32:47	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	agm_setChooseIndex.beans	DELETE	200 OK	20:32:48	September 19, 2000
uscc_com/SilverStream/Pages	a_home.html	DELETE	200 OK	20:32:55	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_home.html	DELETE	200 OK	20:32:56	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_home.class	DELETE	200 OK	20:32:57	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_home.beans	DELETE	200 OK	20:32:59	September 19, 2000
uscc_com/SilverStream/Pages	a_commcalls.html	DELETE	200 OK	20:33:28	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_commcalls.html	DELETE	200 OK	20:33:32	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_commcalls.class	DELETE	200 OK	20:33:33	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_commcalls.beans	DELETE	200 OK	20:33:34	September 19, 2000
uscc_com/SilverStream/Pages	a_cpr011400.html	DELETE	200 OK	20:33:36	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_cpr011400.html	DELETE	200 OK	20:33:37	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_cpr011400.class	DELETE	200 OK	20:33:38	September 19, 2000
uscc_com/SilverStream/Classes/com/sssw/gen/pages	a_cpr011400.beans	DELETE	200 OK	20:33:38	September 19, 2000

EXHIBIT C

Files Modified/Deleted/Installed on September 20, 2000 by IP Address 63.255.158.62:

Path	File/Object	Action	Status from Server	Time	Date
uscc_com/SilverStream/Objectstore/Images	h-USCstaticpics_r2_c1.jpg	PUT	201 Created	19:45:20	September 20, 2000
uscc_com/SilverStream/Classes	dsoMarket.class	PUT	201 Created	19:48:10	September 20, 2000
uscc_com/SilverStream/Meta/Agents/Types	dsoMarket.class	PUT	201 Created	19:48:12	September 20, 2000
uscc_com/SilverStream/Classes	SrvDisplayMap.class	DELETE	200 OK	19:50:38	September 20, 2000
uscc_com/SilverStream/Meta/Agents/Types	InvUpdateRateOrderStatus	DELETE	200 OK	19:51:41	September 20, 2000
uscc_com/SilverStream/Classes	InvUpdateRateOrderStatus.class	DELETE	200 OK	19:51:42	September 20, 2000
uscc_com/SilverStream/Classes/MailObjects	SendMail.class	PUT	201 Created	19:55:57	September 20, 2000